

IN THE COURT OF UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IBRAHIM SHARQAWI	)	CASE NO. 1:20-cv-00271-PAB
	)	
Plaintiff,	)	JUDGE PAMELA A. BARKER
	)	
v.	)	<b><u>PLAINTIFF'S REPLY TO DEFENDANT'S</u></b>
	)	<b><u>POSITION PAPER</u></b>
THE KIRBY COMPANY, et. al.	)	
	)	
Defendants.	)	

Plaintiff, Ibrahim Sharqawi, by and through counsel, hereby submits his Reply to Defendant's Position Paper, per the Court's November 24, 2021 order.

Defendants' stated in their position paper, "Plaintiff's counsel's letter dated October 13, 2021 was the first written communication Defendants' counsel received regarding Plaintiff's specific issues with Defendants' discovery responses as such were not raised or addressed during the parties' meet and confer conferences on September 2 and 14."

This statement is false. Plaintiff's issues with Defendants' discovery responses were raised at both the September 2 and September 14 meet and confer conferences between the parties. However, in both meetings, Defendants' issues with Plaintiff's discovery responses were addressed first, and defense counsel concluded the meetings before Plaintiff's counsel had an opportunity to address specific issues with Defendant's responses. During at least one of those meetings, Plaintiff's counsel listed several specific issues with Defendants' discovery responses before allowing Defense counsel to first discuss their issues with Plaintiff's discovery responses.

Respectfully submitted,

/s/ Caryn M. Groedel  
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Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was filed electronically this 24<sup>th</sup> day of November, 2021. Notice of this filing will be sent to all parties by the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Caryn M. Groedel  
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